

**UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:	§	
	§	Chapter 7
ALEXANDER E. JONES,	§	
	§	Case No. 22-33553 (CML)
Debtor.	§	

NOTICE OF DEPOSITION AND REQUEST FOR PRODUCTION OF DOCUMENTS

TO: **CHRISTOPHER R. MURRAY, CHAPTER 7 TRUSTEE**, by and through his attorney, Joshua W. Wolfshohl, Porter Hedges LLP, 1000 Main Street, 36th Floor, Houston, Texas 77002 and Erin E. Jones, Jones Murray LLP, 602 Sawyer Street, Suite 400, Houston, Texas 77007

PLEASE TAKE NOTICE that pursuant to Rule 30 of the Federal Rules of Civil Procedure, Debtor, Alexander E. Jones will take the deposition of Chris Murray. This deposition will take place PORTER HEDGES LLP, 1000 Main Street, 36th Floor, Houston, Texas 77002, and will commence at 9:00 am on Tuesday, February 4, 2025, unless the parties mutually agree to hold the deposition on a different date or time and/or different location. Parties wishing to attend by Zoom may contact Chrystal Karstedt at cmadden@jhwclaw.com for the zoom link.

This deposition will be taken by stenographic and video means before an officer authorized to administer oaths and will continue from day to day until completed. The deposition will be taken for purposes of discovery, for use at trial in this matter, and for any other purpose permitted under the Federal Rules of Civil Procedure.

PLEASE TAKE FURTHER NOTICE that pursuant to Rules 30 and 37 of the Federal Rules of Civil Procedure, the deponent to produce the documents identified in **Exhibit A** attached to this Notice by Monday, February 3, 2025 at 5:00 pm (CST).

Dated: January 28, 2025

/s/ Shelby A. Jordan

SHELBY A. JORDAN

State Bar No. 11016700

S.D. No. 2195

ANTONIO ORTIZ

State Bar No. 24074839

S.D. No. 1127322

Jordan & Ortiz, P.C.

500 North Shoreline Blvd., Suite 804

Corpus Christi, TX 78401

Telephone: (361) 884-5678

Facsimile: (361) 888-5555

Email: sjordan@jhwclaw.com

aortiz@jhwclaw.com

Copy to: cmadden@jhwclaw.com

COUNSEL FOR ALEX JONES

Ben C. Broocks

State Bar No. 03058800

Federal Bar No. 94507

William A. Broocks

St. Bar No. 24107577

Federal Bar No. 3759653

BROOCKS LAW FIRM P.L.L.C.

248 Addie Roy Road, Suite B301

Austin, Texas 78746

Phone: (512) 201-2000

Fax: (512) 201-2032

Email: bbroocks@broockslawfirm.com

wbroocks@broockslawfirm.com

COUNSEL FOR ALEX JONES

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been served through the Court's ECF noticing system on January 28, 2025.

/s/ Shelby A. Jordan

Shelby A. Jordan

Instructions

Unless indicated otherwise, the period in which documents are requested is from June 1, 2024 to the present.

Please note these requests do not include any requests solely between and among (i) the parties known as the Connecticut Plaintiffs and lawyers who represent them and such lawyers staff; (ii) the parties known as the Texas Plaintiffs and lawyers who represent them and such lawyers' staff; or (iii) Chris Murray, and lawyers who represent him and such lawyers' staff.

If responsive documents are not being produced for any reason other than core attorney client or work product privilege, that withheld documents be logged on a privilege log.

We request the production be made of Documents, which means written materials and/or electronically stored information including writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations, stored in any medium from which information can be obtained either directly or, if necessary, after translation by the responding party into a reasonably usable form

We request the production be made of Documents in their native form in a concordance production format, with metadata included (including images/text/natives, where applicable, along with load files, as well as the hash values for each such document).

Undefined capitalized terms have the following meanings:

- a. "Trustee" means Christopher R. Murray, in his capacity as the duly appointed chapter 7 trustee for the Estate of Alex Jones.
- b. "Settlement" means the settlement embodied or referenced in Dkt. 1011 styled "TRUSTEE'S EXPEDITED MOTION FOR ENTRY OF AN ORDER (I) AUTHORIZING AND APPROVING THE SETTLEMENT BY AND BETWEEN THE CHAPTER 7 TRUSTEE, THE CONNECTICUT FAMILIES, AND THE TEXAS FAMILIES AND (II) GRANTING RELATED RELIEF" and attached proposed order.
- c. "Connecticut Parties" or "Connecticut Families" means and includes Mark Barden, Jacqueline Barden, Francine Wheeler, David Wheeler, Ian Hockley, Nicole Hockley, Jennifer Hensel, William Aldenberg, William Sherlach, Carlos M. Soto, Donna Soto, Jillian Soto-Marino, Carlee Soto Parisi, Robert Parker, and Erica Ash, and all persons presently and/or formerly acting or purporting to act on their behalf.
- d. "Texas Parties" or "Texas Families" means and includes Neil Heslin, Scarlett Lewis, Leonard Pozner, Veronique De La Rosa, and the Estate of Marcel Fontaine, and all persons presently and/or formerly acting or purporting to act on their behalf.
- e. "Global Tetrahedron" means and includes Global Tetrahedron, LLC, and all representatives, employees, associates, partners, counsel, any and all agents, attorneys,

experts, investigators, assigns, successors, predecessors in interest, and all other persons presently and/or formerly acting or purporting to act on its behalf.

Exhibit A

1. All communications, documents, agreements, and proposals to or from, between or among, any of the Trustee and/or the Connecticut Parties and/or the Texas Parties and/or Global Tetrahedron concerning:
 - a. the Settlement;
 - b. the actual or potential purchase by Global Tetrahedron of assets formerly owned by or involving Alex Jones, FSS, and /or Infowars, including without limitation any created or received after December 9, 2024;
 - c. a Distributable Proceeds Waiver as considered, proposed or used in any past, present or future agreement involving any of the Trustee and/or the Connecticut Plaintiffs and/or the Texas Plaintiffs;
 - d. the actual or potential purchase by FUAC of assets formerly owned by or involving Alex Jones, FSS, and /or Infowars, including without limitation any created or received after December 9, 2024;
 - e. the Petition for Certification filed by Alex Jones and/or FSS with the Connecticut Supreme Court;
 - f. the bankruptcy of Alex Jones; and
 - g. the bankruptcy of FSS.
2. All communications, documents, agreements, and proposals to or from, between or among, the Trustee on the one hand and either or both the Connecticut Plaintiffs and/or Texas Plaintiffs related to the Settlement.
3. All communications, documents, agreements, and proposals to or from, between or among, the Trustee on the one hand and Global Tetrahedron on the other hand related to the purchase of assets formerly owned by or involving Alex Jones, FSS, and /or Infowars.
4. Any written or unwritten agreements indicating that the Trustee will abandon the appeal taken on behalf of FSS to the Connecticut Supreme Court or take specific actions related to the appeal of FSS or the abandonment of any other FSS property and/or assets in the Connecticut Parties and Texas Parties favor.
5. Communications where the Trustee agrees to drop or abandon the appeal taken on behalf of FSS to the Connecticut Supreme Court in exchange for preserving the 75/25 split that is referenced in the Settlement.
6. Any discussion of intentionally selling to a “friendly” buyer to prevent the Defendant from reclaiming assets if appeals succeed.

7. Communications amongst the Texas Families related to the allocation of proceeds from the Settlement and/or discussing their respective claim amounts sought to be allowed in the Jones bankruptcy case.
8. All communications, documents, agreements, and proposals to or from, between or among, the Connecticut Families on the one hand and the Texas Families on the other hand related to and/or negotiating terms related to the Settlement.